

DAYLE ELIESON
United States Attorney
PATRICK W. SNYDER, CSBN 260690
Special Assistant United States Attorney
THEOPHOUS H. REAGANS, CSBN 189450
Special Assistant United States Attorney
160 Spear Street, Suite 800
San Francisco, California 94105
Telephone: (415) 977-8938
Facsimile: (415) 744-0134
E-Mail: Theophous.Reagans@ssa.gov

Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ROSA G. VANDIVER,

Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:18-cv-00362-JAD-CWH

**DEFENDANT'S UNOPPOSED MOTION
FOR EXTENSION OF TIME**

IT IS HEREBY STIPULATED, by and between Rosa G. Vandiver (Plaintiff) and Nancy A. Berryhill, Acting Commissioner of Social Security (Defendant), by and through their respective counsel of record, that Defendant shall have an extension of time of thirty (30) days to file her Opposition to Plaintiff's Motion for Summary Judgment. The current due date is August 30, 2018. The new date will be September 30, 2018. An extension of time is needed because the attorney responsible for briefing this case continues to undergo medical treatment, requiring her to take medical leave. This motion is being filed by her supervisor because she is currently unable to work on her cases. This is the second extension of time requested by Defendant in the above referenced case. This request is made in good faith with no intention to unduly delay the proceedings. The parties further

1 stipulate that the Court's Scheduling Order shall be modified accordingly.

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3 Dated: August 28, 2018

By: /s/ Marc V. Kalagian*
MARC V. KALAGIAN
Rohlfing & Kalagian, LLP
Attorney for Plaintiff
(*As authorized via email on 8/28/18)

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7 Dated: August 28, 2018

DAYLE ELIESON
United States Attorney

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9 /s/ Patrick W. Snyder
PATRICK WILLIAM SNYDER
Special Assistant United States Attorney

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11 /s/ Theophous H. Reagans
THEOPHOUS H. REAGANS
Special Assistant United States Attorney

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15 IT IS SO ORDERED:

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17 THE HONORABLE CARL W. HOFFMAN
18 UNITED STATES MAGISTRATE JUDGE

19 DATE: August 30, 2018
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1 IT IS HEREBY CERTIFIED THAT:

2 I, Theophous H. Reagans, certify that the following individual(s) were served with a copy of
3 the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date and via the
4 method
5 of service identified below:

6 **CM/ECF:**

7 Marc V Kalagian
8 Rohlfing & Kalagian, LLP
9 211 E. Ocean Blvd.
10 Suite 420
11 Long Beach, CA 90802
12 Email: marc.kalagian@rksslaw.com

13 I declare under penalty of perjury that the foregoing is true and correct.

14
15 Dated: July 12, 2018

DAYLE ELIESON
United States Attorney
District of Nevada

17 By: /s/ Theophous H. Reagans
18 THEOPHOUS H. REAGANS
19 Special Assistant United States Attorney

20 Attorneys for Defendant
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